

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WEST PAVING
AND DEVELOPMENT CORP.

Case Number 11-02219(MCF)

Debtor

Chapter 11

APPLICATION TO EMPLOY ATTORNEY FOR DEBTOR

TO THE HONORABLE COURT:

COMES NOW, Debtor, **WEST PAVING AND DEVELOPMENT CORP.**, to hereby apply to this Court for the approval of Maria Mercedes Figueroa y Morgade, Esq., as attorney for the Debtor in the above captioned case and in support thereof, respectfully states:

1. The above captioned petition was filed under Chapter 11 of the Bankruptcy Code, 11 USC § 1101 et seq. on March 16, 2011.
2. The applicant is the Debtor in this Bankruptcy case herein represented by its President Jose Luis Plaza Delestre.
3. Debtor, **WEST PAVING AND DEVELOPMENT CORP.** seeks to employ Maria Mercedes Figueroa y Morgade, Esq., as its bankruptcy attorney in this case.
4. Attorney Maria Mercedes Figueroa y Morgade, Esq., will represent the Debtor in all bankruptcy related matters in this case including contested matters and adversary proceedings.
5. The terms of the employment of said attorney, subject to the approval of the court will be \$200.00 per hour of service for Maria Mercedes Figueroa y Morgade, Esq., and actual and necessary expenses.
6. To the best of applicant's knowledge, the professional whose employment is sought

- has no connection with the Debtor, creditors, or any party in interest, including their attorneys, their accountants and the U.S. Trustee's Office or any person employed by said office.
7. Therefore, the attorney qualifies as a disinterested person within the meaning of section 101(14) of the Bankruptcy Code and her employment is in the best interest of the Debtor.
 8. The attorney will not share or agree to share with any other person any amounts to be received as compensation.
 9. The applicant incorporates the Statement of Proposed Attorney subscribed by Maria Mercedes Figueroa y Morgade, Esq., to this application to employ. The attorney's statement certifies she is a disinterested person within the meaning of 11 U.S.C. § 101(14) and in compliance with LBR 2014-1.
 10. The attorney fully understands that her fees must be approved by the Court and the United States Trustee upon the filing of a proper application, in accordance with the Bankruptcy Code.

WHEREFORE, WEST PAVING AND DEVELOPMENT CORP., respectfully requests for this Honorable Court to approve this application and authorize Debtor to employ Maria Mercedes Figueroa y Morgade, Esq., as attorney for the Debtor, at the rates set forth herein, subject to compliance with the application, review, approval and order of this Court.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 23rd day of March 2011.

S/ Jose Luis Plaza Delestre -President

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WEST PAVING
AND DEVELOPMENT CORP.

Case Number 11-02219(MCF)

Debtor

Chapter 11

STATEMENT OF PROPOSED ATTORNEY

I, Maria Mercedes Figueroa y Morgade, Esq., hereby certify under penalty of perjury that to the best of my knowledge, information and belief the following is true and correct:

1. I am an attorney, duly admitted to practice in the Commonwealth of Puerto Rico and in the U.S. District Court for the District of Puerto Rico.
2. I have agreed to represent the captioned Debtor in this bankruptcy case and in all legal matters included therein.
3. I do not hold or represent any interest adverse to the estate of the above-named Debtor.
4. That I am a disinterested person pursuant to 11 U.S.C. §101(14). I have no prior connection with the debtor, creditors, and any other party in interest, the U.S. Trustee Office and the U.S. Trustee Office personnel.
5. The source of the compensation shall be from Debtors funds.
6. I have not agreed to share with any person the compensation to be paid for the services rendered in this case or reimbursement received or to be received under 11 U.S.C. §§330(a) and 503(b) (2), or otherwise in connection with this case, nor will I

share in any such compensation or reimbursement received by another person under such sections.

7. The terms of compensation agreed to and subject to the application, approval of the Court and the US Trustee and order of the Court, will be \$200.00 per hour of service for Maria Mercedes Figueroa y Morgade, Esq., and actual and necessary expenses.
8. I will amend this statement immediately upon learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstances relating thereto.
9. I hereby state I have reviewed the provisions of LBR 2016-1 and include as part of this Statement my professional "Curriculum Vitae" pursuant to the requirements of LBR 2014-1.

March 23, 2011

/s/ M^a Mercedes Figueroa y Morgade

M^a Mercedes Figueroa y Morgade
USDC-PR 207108
3415 Avenida Alejandrino
Box 703
Guaynabo, PR 00969-4956
Tel 787/234-3981
figueroaymorgadelaw@yahoo.com

M^{re} Mercedes Figueroa y Morgade
Professional Curriculum Vitae in compliance with LBR 2014-1

Partner, Figueroa y Morgade Legal Advisors
October 2007 to present
Bankruptcy, Commercial, Real Estate and Tax Law

Represent debtors and creditors in Chapter 7 and Chapter 11 cases, in addition to a Chapter 7 Trustee, in related bankruptcy litigation in the Bankruptcy Court and the Commonwealth Courts. Other practice areas include, tax administrative proceedings, real estate contracts and commercial litigation.

Attorney, Charles A. Cuprill Law Offices
March 2007 to September 2007

Represent debtors in Chapter 7, Chapter 13 and Debtor Chapter 11 cases, including related bankruptcy litigation in the Bankruptcy Court and the Commonwealth Courts. Tasks performed include: conducting initial Debtor interview prior to filing; analysis of accounting, taxes and financial affairs; preparation of bankruptcy petition; attending meeting of creditors; conducting negotiations with creditors; litigation of claims as well as pre and post-confirmation matters; drafting of final decree applications and legal memoranda.

Supervisor, Bankruptcy Unit
Department of Justice of Puerto Rico
August 1997 to February 2007

Legal representative of the Puerto Rico Treasury Department and other government agencies in consumer and commercial bankruptcy proceedings in local and mainland jurisdictions.

Duties and tasks included: analyzing complex bankruptcy law and procedure; drafting of motions, pleadings and briefs in objection to claim litigation, as well as pre and post-confirmation issues in Chapter 11 and Chapter 13 cases; attending oral arguments and evidentiary hearings. Also represented the Treasury Department and other government agencies in adversary proceedings before the Bankruptcy Court, which included drafting motions and pleadings, arguing pre-trial motions, conducting discovery proceedings, and litigating dispositive motions and trials. Created and organized the Collections and Bankruptcy Case Management Units within the Treasury Department and other governmental agencies. Conducted Bankruptcy Seminars for Justice Department attorneys, prosecutors and officers from the Treasury Department and other government agencies. Supervised two other attorneys and an administrative assistant.

Associate, Sergio Ramírez de Arellano Law Offices
September 1996 to May 1997

Represented creditors in consumer and commercial bankruptcy proceedings.

Attorney, Montañez & Alicea Law Offices
June 1991 to September 1996

Organized and directed Bankruptcy Division. Provided services for 10 to 13 banking and financial institutions. Provided competent and aggressive legal representation of secured and unsecured creditors in consumer and business bankruptcy proceedings. Caseload within the range of 600. Drafted motions, pleadings and briefs in bankruptcy case litigation. Prepared legal memorandums and opinions for diverse financial institutions. Case analysis included 11 U.S.C. 341(a) debtor examination and participation, preparation of claims, pre-confirmation motions and litigation of contested matters. Handled 11 U.S.C. 362 litigation and adversary proceedings both as plaintiff and as defendant, including but not limited to avoidance and preference actions and revocation of confirmation orders.

PROFESSIONAL ASSOCIATIONS AND RECENT SEMINARS

President, Bankruptcy Commission of the Puerto Rico Bar Association
2004 to September 2010.

Member, National Association of Attorneys General Bankruptcy Division
1998-2007

Puerto Rico Bankruptcy Bar Association Seminar in 2005 on BAPCPA

Speaker at the Puerto Rico Bar Association Seminar *Creditors Rights under BAPCPA* September 2006.

Speaker at the American Bankruptcy Institute, *Caribbean Insolvency Seminar*, February 2007.

Speaker at the Catholic University Law School Continuing Education Program, *Bankruptcy Basics*, May 2009.